

Tonia Ouellette Klausner  
WILSON SONSINI GOODRICH & ROSATI  
PROFESSIONAL CORPORATION  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Tel: (212) 999-5800  
Fax: (212) 999-5899

*Attorneys for Defendant  
Project Playlist, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ATLANTIC RECORDING CORP.; CAPITAL  
RECORDS, LLC; ELEKTRA  
ENTERTAINMENT GROUP INC.;  
INTERSCOPE RECORDS; MOTOWN  
RECORD COMPANY, L.P.; PRIORITY  
RECORDS LLC; UMG RECORDINGS, INC.;  
VIRGIN RECORDS AMERICA, INC.; and  
WARNER BROS. RECORDS INC.,

Plaintiffs,

v.

PROJECT PLAYLIST, INC.,

Defendant.

ECF Case

Case No. 1:08-cv-03922-DC

**MOTION FOR *PRO HAC VICE*  
ADMISSION OF DAVID H. KRAMER**

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
JUL 18 2008  
CLERK OF COURT

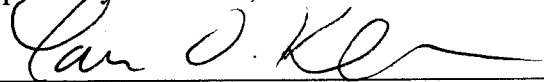
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Tonia Ouellette Klausner, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name:	David H. Kramer
Firm Name:	Wilson Sonsini Goodrich & Rosati, P.C.
Address:	650 Page Mill Road
City/State/Zip:	Palo Alto, CA 94304
Phone Number:	(650) 493-9300
Fax Number:	(650) 493-6811

Mr. Kramer is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Mr. Kramer in any State or Federal court.

Date: July 18, 2008

Respectfully submitted,



---

Tonia Ouellette Klausner  
WILSON SONSINI GOODRICH & ROSATI  
PROFESSIONAL CORPORATION  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Tel: (212) 999-5800  
Fax: (212) 999-5899

*Attorneys for Defendant Project Playlist, Inc.*

Tonia Ouellette Klausner  
WILSON SONSINI GOODRICH & ROSATI  
PROFESSIONAL CORPORATION  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Tel: (212) 999-5800  
Fax: (212) 999-5899

*Attorneys for Defendant  
Project Playlist, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ATLANTIC RECORDING CORP.; CAPITAL  
RECORDS, LLC; ELEKTRA  
ENTERTAINMENT GROUP INC.;  
INTERSCOPE RECORDS; MOTOWN  
RECORD COMPANY, L.P.; PRIORITY  
RECORDS LLC; UMG RECORDINGS, INC.;  
VIRGIN RECORDS AMERICA, INC.; and  
WARNER BROS. RECORDS INC.,

Plaintiffs,

v.

PROJECT PLAYLIST, INC.,

Defendant.

ECF Case

Case No. 1:08-cv-03922-DC

**AFFIDAVIT OF  
TONIA OUELLETTE KLAUSNER  
IN SUPPORT OF *PRO HAC VICE*  
ADMISSION OF DAVID H. KRAMER**

State of New York     )  
                                  )  
County of New York    )     ss:

Tonia Ouellette Klausner, being duly sworn, hereby deposes and says as follows:

1. I am a member with the law firm of Wilson Sonsini Goodrich & Rosati, P.C., counsel for defendant Project Playlist, Inc. ("Defendant") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit David H. Kramer as counsel *pro hac vice* to represent Defendant in this matter.

2. I am a member in good standing of the bar of the State of New York, where I was admitted to practice law in 1994. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Kramer is a member of the law firm of Wilson Sonsini Goodrich & Rosati, P.C., in Palo Alto, California. A true and correct copy of Mr. Kramer's Certificate of Good Standing is attached hereto as Exhibit "A".

4. I have found Mr. Kramer to be a skilled attorney and of high moral character.

5. Accordingly, I am pleased to move for the admission of David H. Kramer, *pro hac vice*.

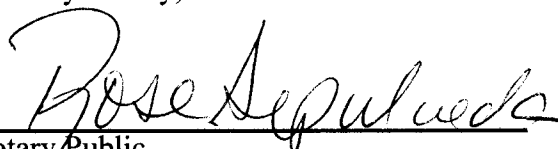
6. I respectfully submit a proposed order granting the admission *pro hac vice* of David H. Kramer, which is attached hereto as Exhibit "B".

WHEREFORE it is respectfully requested that the motion to admit David H. Kramer, *pro hac vice*, to represent Defendant in the above-captioned matter, be granted.

Date: July 18, 2008  
New York, New York

  
\_\_\_\_\_  
Tonia Ouellette Klausner

Sworn to before me this  
18th day of July, 2008

  
\_\_\_\_\_  
Notary Public

ROSE M. SEPULVEDA  
Notary Public, State of New York  
No. 01SE6031652  
Qualified in Kings County  
Commission Expires Oct. 4, 2009



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

July 3, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, DAVID HARRISON KRAMER, #168452 was admitted to the practice of law in this state by the Supreme Court of California on December 14, 1993; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over a horizontal line.

Kath Lambert  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ATLANTIC RECORDING CORP.; CAPITAL  
RECORDS, LLC; ELEKTRA  
ENTERTAINMENT GROUP INC.;  
INTERSCOPE RECORDS; MOTOWN  
RECORD COMPANY, L.P.; PRIORITY  
RECORDS LLC; UMG RECORDINGS, INC.;  
VIRGIN RECORDS AMERICA, INC.; and  
WARNER BROS. RECORDS INC.,

Plaintiffs,

v.

PROJECT PLAYLIST, INC.,

Defendant.

ECF Case

Case No. 1:08-cv-03922-DC

**ORDER FOR  
ADMISSION *PRO HAC VICE*  
ON WRITTEN MOTION**

Upon the motion of Tonia Ouellette Klausner, attorney for defendant Project Playlist, Inc. (“Defendant”), and said sponsor attorney’s affidavit in support;

**IT IS HEREBY ORDERED THAT**

Applicant’s Name: David H. Kramer  
Firm Name: Wilson Sonsini Goodrich & Rosati, P.C.  
Address: 650 Page Mill Road  
City/State/Zip: Palo Alto, CA 94304  
Phone Number: (650) 493-9300  
Fax Number: (650) 493-6811

is admitted to practice *pro hac vice* as counsel for Defendant in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. This action has been assigned to the Electronic Case Filing (ECF) system and as such, counsel shall immediately register for an ECF password.

Dated: July \_\_\_\_, 2008  
New York, New York

---

United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2008, I caused a true and correct copy of the **MOTION FOR *PRO HAC VICE* ADMISSION OF DAVID H. KRAMER and AFFIDAVIT OF TONIA OUELLETTE KLAUSNER IN SUPPORT OF *PRO HAC VICE* ADMISSION OF DAVID H. KRAMER** to be served via U.S. mail on:

Gary A. Orseck, Esq.  
Eva A. Temkin, Esq.  
Alison C. Barnes, Esq.  
Robbins Russell Englert Orseck & Untereiner, LLP  
1801 K Street, N.W. Suite 411  
Washington, D.C. 20006

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 18, 2008

  
\_\_\_\_\_  
Tonia Ouellette Klausner